

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SKAT TAX REFUND SCHEME LITIGATION

This document relates to:

19-cv-01800 (LAK), 19-cv-01803 (LAK),  
19-cv-01809 (LAK), 19-cv-01812 (LAK),  
19-cv-01818 (LAK), 19-cv-01785 (LAK),  
19-cv-01781 (LAK), 19-cv-01791 (LAK),  
19-cv-01801 (LAK), 19-cv-01810 (LAK),  
19-cv-01813 (LAK), 19-cv-01870 (LAK),  
19-cv-01792 (LAK), 19-cv-01806 (LAK),  
19-cv-01808 (LAK), 19-cv-01815 (LAK),  
19-cv-01922 (LAK), 19-cv-01928 (LAK),  
19-cv-01926 (LAK), 19-cv-01929 (LAK),  
19-cv-01931 (LAK), 19-cv-01783 (LAK),  
19-cv-01794 (LAK), 19-cv-01798 (LAK),  
19-cv-10788 (LAK), 19-cv-01918 (LAK).

Master Docket  
18-md-2865 (LAK)

**NOTICE OF JOINDER**

PLEASE TAKE NOTICE that the defendants in the above captioned cases, Crucible Ventures LLC Roth 401(k) Plan, Limelight Global Productions LLC Roth 401(k) Plan, Plumrose Industries LLC Roth 401(k) Plan, Roadcraft Technologies LLC 401(k) Plan, True Wind Investments LLC Roth 401(k) Plan, Ronald Altbach, Albedo Management LLC Roth 401(k) Plan, Ballast Ventures LLC Roth 401(k) Plan, Fairlie Investments LLC Roth 401(k) Plan, Joseph Herman, Monomer Industries LLC Roth 401(k) Plan, Pinax Holdings LLC Roth 401(k) Plan, Sternway Logistics LLC Roth 401(k) Plan, Robin Jones, Eclouge Industry LLC Roth 401(k) Plan, First Ascent Worldwide LLC Roth 401(k) Plan, Loggerhead Services LLC Roth 401(k) Plan, PAB Facilities LLC Roth 401(k) Plan, Trailing Edge Productions LLC Roth 401(k) Plan, Perry Lerner, Cedar Hill Capital Investments LLC Roth 401(k) Plan, Fulcrum Productions LLC Roth 401(k) Plan, Green Scale Management LLC Roth 401(k) Plan, Keystone Technologies LLC Roth 401(k)

Plan, Tumba Systems LLC Roth 401(k) Plan, Edwin Miller, Bareroot Capital Investments LLC Roth 401(k) Plan, Battu Holdings LLC Roth 401(k) Plan, Cantata Industries LLC Roth 401(k) Plan, Dicot Technologies LLC Roth 401(k) Plan, Vanderlee Technologies Pension Plan and David Zelman (collectively, “Defendants”) hereby join and incorporate by reference the motion to dismiss pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, filed on June 12, 2019 in the Master Docket No. 18-MD-2865 (LAK) (ECF #134), and the accompanying memorandum of law (ECF #135), declaration (ECF #139), and the notice of intention to rely upon foreign law (ECF #140), and the reply memorandum of law (ECF #183) and declaration (ECF #184), filed on August 19, 2019, by defendants Richard Markowitz, Jocelyn Markowitz, Avanix Management LLC Roth 401(k) Plan, Batavia Capital Pension Plan, Calypso Investments Pension Plan, Cavus Systems LLC Roth 401(k) Plan, Hadron Industries LLC Roth 401(k) Plan, RJM Capital Pension Plan, and Routt Capital Pension Plan (collectively, the “Markowitz Individual and Pension Plan Defendants”).

For the reasons set forth in the Markowitz Individual and Pension Plan Defendants’ motion to dismiss, the claims against Defendants should be dismissed, along with such other and further relief as the Court deems just and proper.

Dated: New York, New York  
August 19, 2019

KAPLAN RICE LLP

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